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Del Norte El Dorado Glenn Imperial Inyo
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**RCRC Comments
May 29, 2009 Workshop on
20x2020 Water Conservation Statewide Implementation Plan**

Overarching

- The 20x2020 Plan should include a statement recognizing that water conservation is just one of a variety of actions that must be taken to meet the State's water needs.
- RCRC notes that a number of other commenters have made similar comments.

Small and/or Disadvantaged Communities

- The 20x2020 Plan should include recognition of the special needs of small and/or disadvantaged communities and the small water systems serving these communities.
- RCRC notes that Clean Water Action has also raised the issue of the differing needs and challenges faced by disadvantaged and rural communities.

Baseline and Targets

- The 20x2020 Plan states that the analyses provided should be treated as initial estimates as the data available were not complete and the accuracy levels varied significantly among water suppliers.
- How can the 20x2020 Plan recommend that regional targets and deadlines for compliance as well as consequences for failure to comply should be established in legislation?
- RCRC agrees with the Solano County Water Agency that the data is not accurate enough to justify a regulatory program nor is the data accurate enough to set parameters or targets at the regional or local level.
- RCRC agrees with the East Bay Municipal Utilities District that the recommendation that regional targets be placed in statute should be removed from the 20x2020 Plan.

- RCRC also agrees with the Solano County Water Agency that it is inappropriate to reference a dead bill i.e. AB 2175 in the context of an example of a good agricultural water conservation program. RCRC opposed AB 2175 as it was seriously flawed as it related to agricultural water conservation.
- RCRC notes that a number of commenter's question the basic premise of the 20x2020 Plan i.e. the reduction in gallons per capita per day by hydrologic region.
- RCRC agrees with the Placer County Water Agency that this approach is too broad and does not fully address significant regional differences and results in disproportionate burdens across hydrologic regions.
- RCRC notes that several commenter's advocate a process that achieves conservation through reasonable use by every urban customer, with flexibility based on hydrologic region. RCRC urges the 20x2020 Agency Team to consider this suggestion.

Outdoor Water Use

- RCRC suggests that the 20x2020 Plan focus its greatest attention on outdoor water use as the data shows that it has the largest potential for water savings.
- RCRC agrees with the commenter's who pointed out that outdoor conservation efforts should be locally determined (i.e. no mandate of watering frequency).
- RCRC also agrees with the Tuolumne Utilities District that the 20x2020 Plan should recognize that not all landscapes are "urban". Outdoor water use in rural municipal water systems often include a mix of municipal and rural agricultural uses.
- RCRC agrees with the Mountain Counties Water Resources Association that applying mandatory urban standards to the rural areas of the state is unreasonable and would significantly change the character of rural California life.

Best Management Practices

- RCRC opposes mandating actions that are not locally cost-effective.
- RCRC notes that a number of commenter's are in agreement on this point.

Incentives

- RCRC suggests that instead of mandating actions that are not locally cost-effective the State should provide incentives (i.e. grants) to encourage implementation on the local level.

Water Meters

- RCRC opposes the recommendation that legislation be enacted that would impose additional conservation requirements on water suppliers that are not fully metered. If applied to small water systems serving small and/or disadvantaged communities this requirement would only add to the overwhelming burdens many of them currently face.

Water Rates

- RCRC opposes mandating conservation rate structures as recommended. Rates should be determined by local entities.
- RCRC notes that the majority of the commenter's oppose the state mandating water conservation rate structures.

Public Goods Charge

- RCRC does not support the imposition of a public goods charge on water. The imposition of a state charge would negatively impact the ability of local agencies to raise funds to support local efforts.
- RCRC notes that the majority of the commenter's likewise oppose mandating a statewide public goods charge on water.

Recycled Water

- RCRC supports an increase in the use of recycled water and other non-traditional sources of water. RCRC suggests that the 20x2020 Plan should include a discussion of implementation barriers.

Water Rights

- The 20x2020 Plan should specifically provide assurances that implementation of water conservation will not impair in any way the water rights of the entities implementing these programs.
- RCRC agrees with ACWA that language in the 20x2020 Plan that implies that fundamental water reallocation can be achieved without due regard to water rights and area of origin protections must be rectified.

- RCRC notes that a number of other commenter's referred the 20x2020 Agency Team to Water Code Section 1011. Section 1011 states that conservation benefits first accrue to the conserving water user.

Public Information Campaign

- RCRC supports an ongoing statewide water conservation public information and outreach campaign.

Conclusion

- RCRC agrees with ACWA and others that the 20x2020 Plan is not ready to be finalized and submitted to the Governor at this time and should instead be considered a work in progress.

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